

## **Exhibit 5**

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**From:** Whitehead, Jamal  
**To:** ashley.calhoun@akerman.com; Cronan, Sheila; Berger, Adam; andrew@immigrantcivilrights.com; devin@opensky.law; Halm, Lindsay; meena@meenamenter.com  
**Cc:** colin.barnacle@akerman.com; melissa.cizmorris@akerman.com; nick.mangels@akerman.com  
**Subject:** RE: Nwauzor v. GEO - Identifying Class Members Still in Detention  
**Date:** Friday, August 23, 2019 10:41:00 AM  
**Attachments:** [image001.png](#)

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Ashley, are we confirmed for 3:30 today?

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**Jamal N. Whitehead**  
[Schroeter Goldmark & Bender](#)  
206.622.8000 | [whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)

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**From:** Whitehead, Jamal  
**Sent:** Thursday, August 22, 2019 8:24 AM  
**To:** ashley.calhoun@akerman.com; Cronan, Sheila <cronan@sgb-law.com>; Berger, Adam <berger@sgb-law.com>; andrew@immigrantcivilrights.com; devin@opensky.law; Halm, Lindsay <halm@sgb-law.com>; meena@meenamenter.com  
**Cc:** colin.barnacle@akerman.com; melissa.cizmorris@akerman.com; nick.mangels@akerman.com  
**Subject:** RE: Nwauzor v. GEO - Identifying Class Members Still in Detention

Can we do 3:30 p.m. (PST)?

---

**Jamal N. Whitehead**  
[Schroeter Goldmark & Bender](#)  
206.622.8000 | [whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)

---

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**From:** [ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com) <ashley.calhoun@akerman.com>  
**Sent:** Wednesday, August 21, 2019 11:05 PM  
**To:** Whitehead, Jamal <[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)>; Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; andrew@immigrantcivilrights.com; devin@opensky.law; Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; meena@meenamenter.com  
**Cc:** colin.barnacle@akerman.com; melissa.cizmorris@akerman.com; nick.mangels@akerman.com  
**Subject:** RE: Nwauzor v. GEO - Identifying Class Members Still in Detention

**EXTERNAL EMAIL**

I'm available a little later – 2:00 Pacific. I'll send a calendar invite and we can reschedule if needed.

**Ashley Calhoun**  
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D: 303 640 2543 | T: 303 260 7712 | F: 303 260 7714  
Admitted to Practice in Arizona, California, Mississippi, and Colorado  
[ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com)

---

**From:** Whitehead, Jamal <[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)>  
**Sent:** Wednesday, August 21, 2019 9:14 AM  
**To:** Calhoun, Ashley (Assoc-Den) <[ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com)>; Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; andrew@immigrantcivilrights.com; devin@opensky.law; Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; meena@meenamenter.com

**Cc:** Barnacle, Colin (Ptnr-Den) <[colin.barnacle@akerman.com](mailto:colin.barnacle@akerman.com)>; Cizmorris, Melissa (Assoc-Den) <[melissa.cizmorris@akerman.com](mailto:melissa.cizmorris@akerman.com)>; Mangels, Nick (LAA-Den) <[nick.mangels@akerman.com](mailto:nick.mangels@akerman.com)>  
**Subject:** RE: Nwauzor v. GEO - Identifying Class Members Still in Detention

How about Friday at 1:15 p.m. (PST)?

---

**Jamal N. Whitehead**  
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206.622.8000 | [whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)

---

**From:** [ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com) <[ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com)>  
**Sent:** Tuesday, August 20, 2019 11:46 PM  
**To:** Whitehead, Jamal <[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)>; Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [devin@opensky.law](mailto:devin@opensky.law); Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [meena@meenamenter.com](mailto:meena@meenamenter.com)  
**Cc:** [colin.barnacle@akerman.com](mailto:colin.barnacle@akerman.com); [melissa.cizmorris@akerman.com](mailto:melissa.cizmorris@akerman.com); [nick.mangels@akerman.com](mailto:nick.mangels@akerman.com)  
**Subject:** RE: Nwauzor v. GEO - Identifying Class Members Still in Detention

**EXTERNAL EMAIL**

Jamal, thanks for your email. Yes, we are making progress on both items. Let's schedule a call for this week. What does Friday look like for you? Afternoon is best for me.

Ashley

**Ashley Calhoun**  
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D: 303 640 2543 | T: 303 260 7712 | F: 303 260 7714  
Admitted to Practice in Arizona, California, Mississippi, and Colorado  
[ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com)

---

**From:** Whitehead, Jamal <[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)>  
**Sent:** Tuesday, August 13, 2019 5:09 PM  
**To:** Calhoun, Ashley (Assoc-Den) <[ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com)>; Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [devin@opensky.law](mailto:devin@opensky.law); Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [meena@meenamenter.com](mailto:meena@meenamenter.com)  
**Cc:** Barnacle, Colin (Ptnr-Den) <[colin.barnacle@akerman.com](mailto:colin.barnacle@akerman.com)>; Rochefort, Lawrence (Ptnr-WPB) <[lawrence.rochefort@akerman.com](mailto:lawrence.rochefort@akerman.com)>; Eby, Christopher (Assoc-Den) <[christopher.eby@akerman.com](mailto:christopher.eby@akerman.com)>  
**Subject:** RE: Nwauzor v. GEO - Identifying Class Members Still in Detention

Ashley, any updates since our phone call last week? -JW

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**Jamal N. Whitehead**  
Schroeter Goldmark & Bender  
206.622.8000 | [whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)

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**From:** [ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com) <[ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com)>  
**Sent:** Wednesday, August 7, 2019 9:36 AM  
**To:** Whitehead, Jamal <[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)>; Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [devin@opensky.law](mailto:devin@opensky.law); Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>

[law.com](http://law.com)>; [meena@meenamenter.com](mailto:meena@meenamenter.com)

**Cc:** [colin.barnacle@akerman.com](mailto:colin.barnacle@akerman.com); [lawrence.rochefort@akerman.com](mailto:lawrence.rochefort@akerman.com); [christopher.eby@akerman.com](mailto:christopher.eby@akerman.com)

**Subject:** RE: Nwauzor v. GEO - Identifying Class Members Still in Detention

**EXTERNAL EMAIL**

Jamal,

Thanks for your time today and your email below. We'll be in touch soon.

Best,  
Ashley

**Ashley Calhoun**

Akerman LLP | 1900 Sixteenth Street, Suite 1700 | Denver, CO 80202

D: 303 640 2543 | T: 303 260 7712 | F: 303 260 7714

Admitted to Practice in Colorado, California, Arizona, and Mississippi

[ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com)

---

**From:** Whitehead, Jamal <[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)>

**Sent:** Wednesday, August 7, 2019 10:35 AM

**To:** Calhoun, Ashley (Assoc-Den) <[ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com)>; Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [devin@opensky.law](mailto:devin@opensky.law); Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [meena@meenamenter.com](mailto:meena@meenamenter.com)

**Cc:** Barnacle, Colin (Ptnr-Den) <[colin.barnacle@akerman.com](mailto:colin.barnacle@akerman.com)>; Rochefort, Lawrence (Ptnr-WPB) <[lawrence.rochefort@akerman.com](mailto:lawrence.rochefort@akerman.com)>; Eby, Christopher (Assoc-Den) <[christopher.eby@akerman.com](mailto:christopher.eby@akerman.com)>

**Subject:** RE: Nwauzor v. GEO - Identifying Class Members Still in Detention

Ashley,

I'm glad we could connect this morning to discuss the issues raised in my July 16 and August 6 emails. Please get back to me this week with whether and when GEO will comply with our requests. Thank you.

Best,  
Jamal

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**Jamal N. Whitehead**

[Schroeter Goldmark & Bender](http://schroetergoldmark.com)

206.622.8000 | [whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)

---

**From:** Whitehead, Jamal

**Sent:** Tuesday, August 6, 2019 2:36 PM

**To:** [ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com); Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [">devin@opensky.law](mailto:devin@opensky.law); Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [meena@meenamenter.com](mailto:meena@meenamenter.com)

**Cc:** [colin.barnacle@akerman.com](mailto:colin.barnacle@akerman.com); [lawrence.rochefort@akerman.com](mailto:lawrence.rochefort@akerman.com); [christopher.eby@akerman.com](mailto:christopher.eby@akerman.com)

**Subject:** RE: Nwauzor v. GEO - Identifying Class Members Still in Detention

Hi Ashley, tomorrow morning (8/7) at 9:00 a.m. (PST) works for me. I'll send you a meeting invitation in a few

moments with a dial in number. -JW

---

**Jamal N. Whitehead**

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206.622.8000 | [whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)

---

**From:** [ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com) <[ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com)>  
**Sent:** Tuesday, August 6, 2019 1:01 PM  
**To:** Whitehead, Jamal <[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)>; Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); [devin@opensky.law](mailto:devin@opensky.law); Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [meena@meenamenter.com](mailto:meena@meenamenter.com)  
**Cc:** [colin.barnacle@akerman.com](mailto:colin.barnacle@akerman.com); [lawrence.rochefort@akerman.com](mailto:lawrence.rochefort@akerman.com); [christopher.eby@akerman.com](mailto:christopher.eby@akerman.com)  
**Subject:** RE: Nwauzor v. GEO - Identifying Class Members Still in Detention

**EXTERNAL EMAIL**

Jamal,

Does tomorrow, 8/6, at 9:00 a.m. (Pacific)/10:00 a.m. (Mountain) still work for you for a conferral on these matters? If so, what number should I call?

Best,  
Ashley

**Ashley Calhoun**

Akerman LLP | 1900 Sixteenth Street, Suite 1700 | Denver, CO 80202  
D: 303 640 2543 | T: 303 260 7712 | F: 303 260 7714  
Admitted to Practice in Colorado, California, Arizona, and Mississippi  
[ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com)

---

**From:** Whitehead, Jamal <[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)>  
**Sent:** Tuesday, August 6, 2019 1:29 PM  
**To:** Barnacle, Colin (Ptnr-Den) <[colin.barnacle@akerman.com](mailto:colin.barnacle@akerman.com)>  
**Cc:** [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; [devin@opensky.law](mailto:devin@opensky.law); Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [meena@meenamenter.com](mailto:meena@meenamenter.com); Rochefort, Lawrence (Ptnr-WPB) <[lawrence.rochefort@akerman.com](mailto:lawrence.rochefort@akerman.com)>; Calhoun, Ashley (Assoc-Den) <[ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com)>; Eby, Christopher (Assoc-Den) <[christopher.eby@akerman.com](mailto:christopher.eby@akerman.com)>  
**Subject:** RE: Nwauzor v. GEO - Identifying Class Members Still in Detention

Colin,

In addition to my email dated July 16, I'd also like to discuss GEO's response to Plaintiffs' RFP 4.c and Z, requesting all records reflecting VWP payments to class members. GEO produced some records (see, e.g., GEO-State 252769), but they are incomplete and outside the class period. Ryan Kimble, GEO's associate warden of finance at NWDC, testified at deposition that these records are maintained in the "Keefe Banking System" (Kimble Tr. at 67-77), and Keefe touts on its website its ability to export data in XML and other comma-delimited file formats. We'd like to talk about obtaining comprehensive records for the class period in excel format.

Best,  
Jamal



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**Jamal N. Whitehead**

Attorney

Schroeter Goldmark & Bender

810 Third Avenue, Suite 500

Seattle, WA 98104

Tel: 206.622.8000 | Fax: 206.682.2305

[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com) | [sgb-law.com](http://sgb-law.com) | [en español](#)

**CONFIDENTIALITY NOTICE:** This e-mail may contain confidential and privileged information. If you have received this e-mail by mistake, please delete it without distributing it to anyone else, and notify me immediately via e-mail or telephone at 206-622-8000. Thank you.

---

**From:** Whitehead, Jamal

**Sent:** Tuesday, August 6, 2019 10:49 AM

**To:** [colin.barnacle@akerman.com](mailto:colin.barnacle@akerman.com)

**Cc:** [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; [devin@opensky.law](mailto:devin@opensky.law); Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [meena@meenamenter.com](mailto:meena@meenamenter.com); [lawrence.rochefort@akerman.com](mailto:lawrence.rochefort@akerman.com); [ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com); [christopher.eby@akerman.com](mailto:christopher.eby@akerman.com)

**Subject:** RE: Nwauzor v. GEO - Identifying Class Members Still in Detention

Thanks for getting back to me, Colin. Can we talk in the AM—perhaps 9:00 or 10:00?

---

**Jamal N. Whitehead**

[Schroeter Goldmark & Bender](#)

206.622.8000 | [whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)

---

**From:** [colin.barnacle@akerman.com](mailto:colin.barnacle@akerman.com) <[colin.barnacle@akerman.com](mailto:colin.barnacle@akerman.com)>

**Sent:** Monday, August 5, 2019 6:59 PM

**To:** Whitehead, Jamal <[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)>

**Cc:** [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; [devin@opensky.law](mailto:devin@opensky.law); Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [meena@meenamenter.com](mailto:meena@meenamenter.com); [lawrence.rochefort@akerman.com](mailto:lawrence.rochefort@akerman.com); [ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com); [christopher.eby@akerman.com](mailto:christopher.eby@akerman.com)

**Subject:** Re: Nwauzor v. GEO - Identifying Class Members Still in Detention

**EXTERNAL EMAIL**

Sure, how about Wednesday at 3:00 PST / 4:00 MST?

Sent from my iPhone

On Aug 5, 2019, at 6:47 PM, Whitehead, Jamal <[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)> wrote:

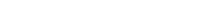
Thanks, Kristin.

Ashley, Chris, Colin, are you available for a call tomorrow afternoon or Wednesday to discuss our request further?

---

**Jamal N. Whitehead**  
Schroeter Goldmark & Bender  
206.622.8000 | [whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)

[vCard](#) | [Profile](#)



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---

**From:** [Kristin.Asai@hklaw.com](mailto:Kristin.Asai@hklaw.com) <[Kristin.Asai@hklaw.com](mailto:Kristin.Asai@hklaw.com)>  
**Sent:** Thursday, August 1, 2019 1:33 PM  
**To:** Whitehead, Jamal <[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)>; [Shannon.Armstrong@hklaw.com](mailto:Shannon.Armstrong@hklaw.com); [Matt.Donohue@hklaw.com](mailto:Matt.Donohue@hklaw.com)  
**Cc:** [andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com); Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; [devin@opensky.law](mailto:devin@opensky.law); Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; [meena@meenamenter.com](mailto:meena@meenamenter.com); [colin.barnacle@akerman.com](mailto:colin.barnacle@akerman.com); [lawrence.rochefort@akerman.com](mailto:lawrence.rochefort@akerman.com); [ashley.calhoun@akerman.com](mailto:ashley.calhoun@akerman.com); [christopher.eby@akerman.com](mailto:christopher.eby@akerman.com)  
**Subject:** RE: Nwauzor v. GEO - Identifying Class Members Still in Detention

**EXTERNAL EMAIL**

Hi Jamal—I am confirming that we received your email below. I have copied GEO's new counsel on this email, and expect that they will respond to your request when they are able.

Thanks,  
Kristin

**Kristin Asai | Holland & Knight**  
Attorney  
Holland & Knight LLP  
2300 U.S. Bancorp Tower, 111 S.W. Fifth Avenue | Portland, Oregon 97204  
Phone 503.517.2948 | Fax 503.241.8014  
[kristin.asai@hklaw.com](mailto:kristin.asai@hklaw.com) | [www.hklaw.com](http://www.hklaw.com)

[Add to address book](#) | [View professional biography](#)

---

**From:** Whitehead, Jamal <[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)>  
**Sent:** Monday, July 29, 2019 9:54 AM  
**To:** Asai, Kristin (POR - X52948) <[Kristin.Asai@hklaw.com](mailto:Kristin.Asai@hklaw.com)>; Armstrong, Shannon (POR - X52924) <[Shannon.Armstrong@hklaw.com](mailto:Shannon.Armstrong@hklaw.com)>; Donohue, J. Matthew (POR - X52913) <[Matt.Donohue@hklaw.com](mailto:Matt.Donohue@hklaw.com)>  
**Cc:** Andrew Free <[andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; Cronan,

Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; Devin Theriot-Orr <[devin@opensky.law](mailto:devin@opensky.law)>; Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; Meena Menter <[meena@meenamenter.com](mailto:meena@meenamenter.com)>

**Subject:** RE: Nwauzor v. GEO - Identifying Class Members Still in Detention

*[External email]*

Kristin, do you have a response or update re: my email below? -JW

---

**Jamal N. Whitehead**

Schroeter Goldmark & Bender

206.622.8000 | [whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)

---

**From:** Whitehead, Jamal

**Sent:** Tuesday, July 16, 2019 5:06 PM

**To:** [Kristin.Asai@hklaw.com](mailto:Kristin.Asai@hklaw.com); [Shannon.Armstrong@hklaw.com](mailto:Shannon.Armstrong@hklaw.com); [Matt.Donohue@hklaw.com](mailto:Matt.Donohue@hklaw.com)

**Cc:** Andrew Free <[andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com)>; Berger, Adam <[berger@sgb-law.com](mailto:berger@sgb-law.com)>; Cronan, Sheila <[cronan@sgb-law.com](mailto:cronan@sgb-law.com)>; Devin Theriot-Orr <[devin@opensky.law](mailto:devin@opensky.law)>; Halm, Lindsay <[halm@sgb-law.com](mailto:halm@sgb-law.com)>; Meena Menter <[meena@meenamenter.com](mailto:meena@meenamenter.com)>

**Subject:** Nwauzor v. GEO - Identifying Class Members Still in Detention

Kristin,

I write to update you on our efforts to ferret out old, incorrect, or missing address information from the class list produced by GEO and to request GEO's help in identifying those class members who may still be in GEO/ICE custody.

To recap, GEO produced an initial class list on April 12, 2019, identifying 9,131 class members. GEO later supplemented this list on April 29 to include address information, but the spreadsheet GEO produced contained over 46,000 rows of address information. At your direction, we contacted ICE about determining the last, best address for each class member. Based on ICE's input, and as described in my June 6 email, we have "deduplicated" the class list to identify the addresses associated with the most recent date found under any of the various date column headings on the supplemental class list (i.e., From date, To Date, EID Adr Create date, EID ADR Update date).

Presently, we have identified 3,440 class members for whom there is no date information and at least one institutional address (i.e., NWDC or another ICE/Immigration facility). A small subset of this group—107—had no date or address information at all.

The attached spreadsheet identifies these class members by name and "inmate id" and includes the address information causing us to question whether they are still in custody. The spreadsheet is designated as "CONFIDENTIAL" under the protective order already in place.

**Please verify whether any of the class members listed on the attached spreadsheet are currently detained. And if so, please confirm the facility at which they are located.**

If need be, I'm available over the next few days to discuss this further on a call.

Best,

Jamal

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